

ATTACHMENT A-2
DEFENDANT'S JURY QUALIFICATION QUESTIONS

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION**

SANTANA BRYSON and JOSHUA
BRYSON, as Administrators of the
Estate of C.Z.B., and as surviving
parents of a deceased minor, C.Z.B.,

Plaintiffs,

v.

ROUGH COUNTRY, LLC,

Defendant.

Civil Action No.

2:22-CV-17-RWS

ATTACHMENT “A”

DEFENDANT’S JURY QUALIFICATION QUESTIONS

1. Does any member of the panel know or are you related to Tedra L. Cannella of Cannella Snyder LLC?
2. Does any member of the panel know or are you related to Robert H. Snyder of Cannella Snyder LLC?
3. Does any member of the panel know or are you related to Devin L. Mashman of Cannella Snyder LLC?
4. Does any member of the panel know any employees of, or has any member of the panel or their immediate family worked for or been represented by the law firm of Cannella Snyder LLC?

5. Does any member of the panel know or are you related to Richard H. Hill of Weinberg Wheeler Hudgins Gunn & Dial LLC in Atlanta, Georgia?
6. Does any member of the panel know or are you related to Aaron B. Chausmer of Weinberg Wheeler Hudgins Gunn & Dial LLC in Atlanta, Georgia?
7. Does any member of the panel know any employees of, or has any member of the panel or their immediate family worked for or been represented by the law firm of Weinberg Wheeler Hudgins Gunn & Dial LLC?
8. Does anyone know or are you related to Plaintiffs Santana and Joshua Bryson, of Cedartown, Georgia in the case?
9. Does anyone know any of the following individuals who may be witnesses in this case?
 - Joshua Bryson
 - Santana Bryson
 - G. Bryant Buchner, P.E.
 - Paul R. Lewis, Jr.
 - Christopher Roche
 - Jonathan Eisenstat, MD
 - Patrick Just
 - Ken Dunn

- Rad Hunsley
- Charles Crosby, P.E.
- Wesley Grimes, P.E.
- Lisa P. Gwin, D.O., BSEE, BSN
- Robert J. Pascarella
- Trooper Andrew Phillips

10.Does anyone believe you know anything about this case or that you have heard anything about this case before coming into court today?

11.Is there any member of the panel who would not accept the law as I give it to you in my instructions even if you disagree with the law?

12.Is there any member of the panel who has any special disability or problem that would make serving as a member of this jury difficult or impossible?

13.Does any juror hold any belief, religious or otherwise, which discourages or prevents jury service?

14.Are you over the age of 18?

15.Are you a United States citizen?

16.Have you been a resident of the Northern District of Georgia, Gainesville Division for at least one year? This includes the following counties: Banks, Barrow, Dawson, Fannin, Forsyth, Gilmer, Habersham, Hall, Jackson, Lumpkin, Pickens, Rabun, Stephens, Towns, Union, and White.

17. Are you currently subject to felony charges punishable by imprisonment for more than one year?
18. Have you ever been convicted of a felony wherein your civil rights have not been legally restored?
19. Does any juror have difficulty hearing?
20. Are any of you not a citizen of the United States of America?
21. Are any of you not yet 18 years of age or older?
22. Are any of you unable to read, write and understand the English language with a degree of proficiency sufficient to fill out satisfactorily a juror qualification form?
23. Are any of you unable to speak the English language?
24. Have any of you been convicted in any state or federal court of any felony or other crime punishable by imprisonment for more than one year? (If the answer to the question is yes, follow-up questions should be asked to determine if the potential juror has had his or her civil rights restored.)
25. Does any member of this panel know an officer, agent, employee, or director of Rough Country LLC? (If the answer to this question is yes, follow-up questions should be asked to determine the knowledge of the potential juror.)

26. Do you or your immediate families have any relationship or connection with Rough Country LLC? If so, what is your relationship or connection to Rough Country LLC?